

# KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | SUITE 7110  
NEW YORK, NEW YORK 10118  
TEL (212) 763-0883 | FAX (212) 564-0883  
WWW.KAPLANHECKER.COM

DIRECT DIAL (929) 295-2544  
DIRECT EMAIL aconlon@kaplanhecker.com

November 6, 2020

Honorable Richard M. Berman  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Courtroom 17B  
New York, NY 10007

Re: *U.S.A. v. Klein*, 1:18-cr-00711-RMB

Dear Hon. Judge Berman:

I write to request permission for Mr. Klein to travel to visit Pennsylvania State University with his daughter, who is considering applying there for college.

Mr. Klein has been on pretrial release since his initial appearance before the magistrate court on October 11, 2018. It is a condition of Mr. Klein's pretrial release that he not travel outside the Southern District of New York, the Eastern District of New York, and the District of New Jersey without permission of the Court.

Mr. Klein respectfully seeks permission to travel with his family to Pennsylvania State University in State College, Pennsylvania. He and his family would drive from New Jersey to Pennsylvania for a day-time visit and return to New Jersey in the evening. They would depart today, Friday, November 6th.

The government does not object to a modification of Mr. Klein's release conditions to accommodate the proposed travel.

Respectfully submitted,




Alexandra Conlon

cc: (by email)

Nicolas Roos  
Assistant United States Attorney

Mia Rahman  
Pretrial Services

Application granted on consent.	
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SO ORDERED:	 Richard M. Berman, U.S.D.J.
Date: 11/9/2020	